

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:14-CV-00159-KS-MTP

DANIEL G. "DANNY" ABEL, et al

DEFENDANTS

**DEFENDANTS, RAMONA FERNANDEZ, JANEY LAMAR, AND THE STUART
SMITH LAW CLINIC'S RESPONSE TO PLAINTIFF'S MOTION FOR COST OF
SERVICE OF PROCESS**

COME NOW Defendants, Ramona Fernandez, Janey Lamar, and the Stuart H. Smith Law Clinic and Center for Social Justice of Loyola University New Orleans, incorrectly named by Plaintiff as the "Stuart Smith Law Clinic d/b/a Loyola University New Orleans" (hereinafter collectively "these Defendants"), by and through counsel, and file this their Response to Plaintiff's Motion for Costs of Service of Process [Doc. #36] and would show unto the Court the following:

Pursuant to Fed. Rule Civ. Proc. 4(d)(2), these Defendants will send Mr. Handshoe a cashier's check in the amount of Three Hundred Thirty Nine and 10/100 Dollars (\$339.10) for the cost of service of process shown in the invoice of J.S. Investigations [Doc. 37-4]. Therefore, Plaintiff's motion should be denied as moot insofar as it pertains to these Defendants.

These Defendants expressly reserve, however, the right to seek the recovery of this expense as costs of this proceeding, should the Court dispose of the Plaintiff's claims in this matter in favor of these Defendants.

Respectfully submitted this the 4th day of June, 2015.

Ramona Fernandez, Janey Lamar, and the Stuart H. Smith
Law Clinic and Center for Social Justice of Loyola
University New Orleans, Defendants

BY: DUKES, DUKES, KEATING & FANCA, P.A.

BY: /s/ W. Edward Hatten, Jr.

W. EDWARD HATTEN, JR. (MSB #8859)
BRADLEY E. DEAN (MSB #101161)
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CERTIFICATE OF SERVICE

I, W. Edward Hatten, Jr., do hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

Douglas Handshoe, Pro Se Plaintiff
Post Office Box 788
110 Hall St.
Wiggins, MS 39577

and also mailed the same via U.S. Mail to the following:

Daniel G. Abel, Pro Se Defendant
2421 Clearview Parkway
Metairie, LA 70001

Chris Yount, Pro Se Defendant
545 Terrace Street
Jefferson, LA 70121

This the 4th day of June, 2015.

BY: /s/ W. Edward Hatten, Jr.

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